



Mary Catherine Roper
Staff Attorney
Eastern Regional Office
mproper@aclupa.org
Ext. 116

June 14, 2007

Eastern Region Office
PO Box 40008
Philadelphia, PA 19106
215.592.1513 T
215.592.1343 F

Central Region Office
PO Box 11761
Harrisburg, PA 17108
717.238.2258 T
717.236.6895 F

Western Region Office
313 Atwood Street
Pittsburgh, PA 15213
412.681.7736 T
412.681.8707 F

Filed Via ECF

Hon. Gregory M. Sleet
United States District Court
District of Delaware
Lock Box 19
844 N. King Street
Wilmington, DE 19801

Re: *Galperin v. Delaware State Police Sergeant Mark DiJiacomo, , et al.*
Civil Action No.: 06-cv-359 (GMS)

Dear Judge Sleet:

The above-referenced matter is scheduled for a jury trial beginning **July 31, 2007** and for a pre-trial conference on **July 10, 2007 at 11:00**, with the pre-trial order due to be filed no later than **June 18, 2007**. We are writing to jointly request that the Court grant an extension of one week for the filing of the proposed pre-trial order in this case. If granted, that would change the due date from June 18 to **June 25, 2007**.

The reason for the request is that the parties to this action are close to settlement, after engaging in extensive discussions and mediation with Judge Thyng. Counsel for the plaintiffs and counsel for Sgt. DiJiacomo are hard at work drafting a settlement agreement incorporating the fairly extensive terms discussed between them, and working out details of enforcement of the non-monetary aspects of the agreement. The agreement will have to be reviewed by all Plaintiffs and, of course, at several levels within the Delaware State Police before it can be finalized. We anticipate that the settlement can be concluded by early next week.

Plaintiffs have also reached an agreement in principle with Defendants Barrett-Toomey and Melrose and are in the process of negotiating a separate, and likewise multi-faceted, agreement with those parties. Plaintiffs anticipate completion of those negotiations, as well, early next week.

Hon. Gregory M. Sleet
June 14, 2006
Page 2 of 2

We further understand that, if the requested extension is granted, it would not change the date for the pre-trial conference or the trial date in this case. Undersigned counsel are agreeable to those terms and request the extension with that understanding.

Respectfully submitted,

/s/ Mary Catherine Roper
Mary Catherine Roper (admitted *pro hac vice*)
American Civil Liberties Union of Pennsylvania
P.O. Box 40008
Philadelphia, PA 19106
(215) 592-1513, ext. 116
Counsel for Plaintiffs

/s/ Ralph K. Durstein, III
Ralph K. Durstein, III
Department of Justice
State of Delaware
820 N. French Street
Wilmington, DE 19801
(302) 577-8510
Counsel for Mark DiJiacomo

SO ORDERED:

Gregory M. Sleet
United States District Judge

Dated: _____

cc: All Counsel